### IN THE UNITED STATES DISTRICT COURT IN THE UNITED STATES DISTRICT OF PENNSYLVANIA HARRISBURG, PA

WILLIAM CLARK,

Plaintiff,

Civil No. 01-0764

(Judge William W. Caldwell) v.

JURY TRIAL DEMANDED LARRY LIDGETT, et al.,

Defendants.

#### PRAECIPE TO SUBSTITUTE

#### TO THE CLERK:

Please substitute the attached UNSWORN DECLARATION OF LESA GARVEY MEDICAL RECORDS SUPERVISOR, located within the Corrections Defendants' Supporting Documents to Their Motion for Summary Judgment, Volume II, Exhibit 8, filed on January 2, 2003, with the attached Declaration that contains documents referenced therein as "Exhibit A"

Respectfully submitted, Office of General Counsel

BY:

John J. Talaber
Assistant Counsel
PA Department of Corrections
Office of Chief Counsel
55 Utley Drive
Camp Hill, PA 17011
(717) 731-0444
Attorney ID # 83279

Dated: January 10, 20023

# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM CLARK,

v.

Plaintiff,

Civil No. 01-0764

0.

(Judge William W. Caldwell)

LARRY LIDGETT, et al.,

•

Defendants.

### UNSWORN DECLARATION OF LESA GARVEY MEDICAL RECORDS SUPERVISOR

- I, Lesa Garvey, pursuant to 28 U.S.C. §1746, hereby declare the following statements are true and correct, based upon my personal knowledge, information, and belief as the Medical Records Supervisor at the State Correctional Institution at Rockview:
- 1. I am employed by the Pennsylvania Department of Corrections ("Department").
- 2. As the Medical Records Supervisor I am responsible for the planning, organizing, and directing the daily operation of the Medical Record Department. I assure that the medical reports and documented entries are in accordance with prudent documentation practices; review

medical reports for completeness and accuracy; and assist in the preparation of medical records being transferred to other facilities and/or processing of medical records on inmates being received into the facility.

- 3. Plaintiff William Clark ("AY-5585") is currently incarcerated at SCI-Rockview.
- 4. Clark has been under the care, custody, and control of the Department of Corrections numerous times dating back to November 1984.
- 5. Department Policy requires that an inmate's medical records contain information and documents generated from medical personnel, and must include medical records generated at previous state correctional institutions where the inmate was formerly incarcerated.
- 6. The records that I maintain at SCI-Rockview for Plaintiff Clark contain his medical records dating back to his first incarceration in 1984 at SCI-Graterford.
- 7. I certify to the best of my knowledge, information, and belief that the attached copies (Exhibit A), produced from the Department's medical file for Plaintiff Clark were:
  - a. made at or near the time of the occurrence of the matters set forth by a person with knowledge of those matters; and

- kept in the course of the regularly conducted activities of the b. Department in providing health care to Plaintiff Clark; and
- maintained by regularly conducted activities of the Department c. involving Plaintiff Clark's health care.

Date: June 27, 2002

Medical Records Supervisor

SCI-Rockview





#### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS

#### **DISPENSARY CARD**

Inmate Identification

D.O.B. 9-11-54
SSN 169-46-2405
Inst. No. Ay 5585
Name Clark, William

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Dispensary Card - Continued **Medication or Treatment** Date Signature  $s_{i} \sim s_{i}$ A

### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS

#### **DISPENSARY CARD**

Inmate Identification

D.O.B. 9-11-54

SSN 169 - 46 - 2805

Inst. No. A.Y. 5585

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	Hypersensitivity			
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Dispensary Card - Continued Signature Medication or Treatment Date

	Dispensary Card - Continued	
Date	Medication or Treatment	Signature
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	OD from 3-20-97 PAC.	
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#### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS

#### **DISPENSARY CARD**

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9 Inmate Identification D.O.B. 9-11-55

SSN 169-46-2805
Inst. No. At 5585
Name Clark, William

	Hypersensitivity		,
Date	Medication or Treat	ment	Signature
6-20-97	O'my back really hus	to down here	"D Unmate)
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	primarily in @ side,	Resting at p	resent @
	affered comfort Oco	ntinue to mon	if or Amens
2035	O Unmate ambulated &	, , , ,	lokshelpe (1)
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	Dispensary Card - Continued	
Date	Medication or Treatment	Signature
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	movement is limited due to	Dain Port
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0830	(S!) My Back Apoms + Buits the pame as los	tout must till in
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	Souly Lung JA, normative lowered	werback of
	Asoreness left ankle area over gosterian he	el toankle of 98.4.
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	seilch Sul Gell	
	S. SHUMAI	KER MD
·		A 10



### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS

#### **DISPENSARY CARD**

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Inmate Identification
D.O.B. 9-11-54
SSN 169-46-2805
Inst. No. A45585
Name Clark, William

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	Hypersensitivity		Signature
Date	Medication or Treat		
6-24-97	O'U think I need my n	usale relaxan	t ra-ordered
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	sacral area, primarily	10 mills Jakin	in massin
	discontinued, requests	Whillow. Suker	1 1 morell
	soong for pain à naver	relief. Duft	red complet
	O PA referral		Musicipen
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6/24/97	7 2007 1975	- 0 4 - 1 - 1	locan Cumply
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			Has been do generalized junt aches
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Progress Notes
Commonwealth of Pennsylvania
Department of Corrections
DC-472

Inmate Name:

Clark. Celm

Inmate Number:

9-11-54

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DOB:

A45583

Institution:

.Date/	Prob	Discipline Abbreviation	Remarks
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3/12/98	141		Pt STATES he has extremly fant oder" from
Por			Nose mus in Bork of Throck X sev. days.
0935			Mucus is Shill - putil tusting + 2 odos
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Date/	Prob	Discipline Abbreviation	Remarks Subjective, Objective, Assessment, Plan
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			or Prorasis
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1015			BATID SLE SNARD
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Progress Notes
Commonwealth of Pennsylvania
Department of Corrections
DC-472

Inmate Name: Clark, William

16

Inmate Number: A 45585

DOB:

Institution: SCI-R

			[ ] Inpatient
		Remarks	
#	Abbreviation	Subjective, Objective, Assessment, I	Plan
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**Progress Notes** Commonwealth of Pennsylvania **Department of Corrections** DC-472

Inmate Name: Clack Wy
Inmate Number: A 45585

DOB:

Institution: 5CI-R

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Date/	Prob	Discipline	Remarks
Time	#	Abbreviation	Subjective, Objective, Assessment, Plan
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	[]0	Outpatient	[ ] Inpatient
Date/	Prob	Discipline	Remarks
Time	#	Abbreviation	Subjective, Objective, Assessment, Plan
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			P Flv 60 days andt
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			Gutine court neds, Ole when we availed Shumaker!
		-	Inmate Name: CLARK, .Wm.
Pr	ogress ]	Notes	
Co	mmon	wealth of Pen ent of Correct	insylvania Inmate Number: AY5585 A 19
	ерагине С-472	ant of Collect	DOB: 9-11-54
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Institution: SCI-R

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A 3	1	Date/	Prob #	Discipline Abbreviation	Remarks
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	1		PROGRESS NOTES
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Date/	Prob	Discipline Abbreviation	Remarks
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			O' Ein: Perrla, Eom I & ingen & discharge
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	1		2. Openty referred F/3 hypergue
~			Inmate Name: Luk, Wm. 27
	ress Not	tes alth of Penns	ylvania Inmate Number: Ay 5585
Depa	rtment	of Correctio	ns BURN
DC-4	72		Inmate Name: (LUK, Wm.)  Inmate Number: A y 5585  DOB: 9 /11 54  Institution: 1 / 200 K Journe)
		• .	Institution: Stiffockveine

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	Date/ Time	Prob #	Discipline Abbreviation	Remark Subjective, Objective, Assessment, Plan
	10.46	518	PAC	5. Claims proviosis is getting worse on
	196	anim ci	TCorrectio	hands in Haon't go Hen his Clobelasol
	Progr	ess-No	æ, 15 \$ 1	so that may be why hards are
				worsening without
				2 MARAMEO 12 lead & 1-18 hours
and the state of				havels. Milliple thick white plagues
Charles and Assault				over dorsal chands & Surrounding
	-			injthena Odl
14 F	V=			A: Psonasis
,	1		Service Service Court	P: Clobetasol aiven - was in pharmacy
	1			HU cms as sched 10/19/99
	ı			CAMPA-E
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**PROGRESS NOTES** 1 Outpatient. - Inpatient Remarks # Discipline Date/ Abbreviation Subjective, Objective, Assessment, Plan Time 2FT brown AUT. 61 1131 1240 1000 gg 10-22 93 6830 BURN PA-C I.D. clu

Progress Notes
Commonwealth of Pennsylvania
Department of Corrections
DC-472

Inmate Name:

Clark, william

Inmate Number: A 4 5585

DOB: 9-11-54

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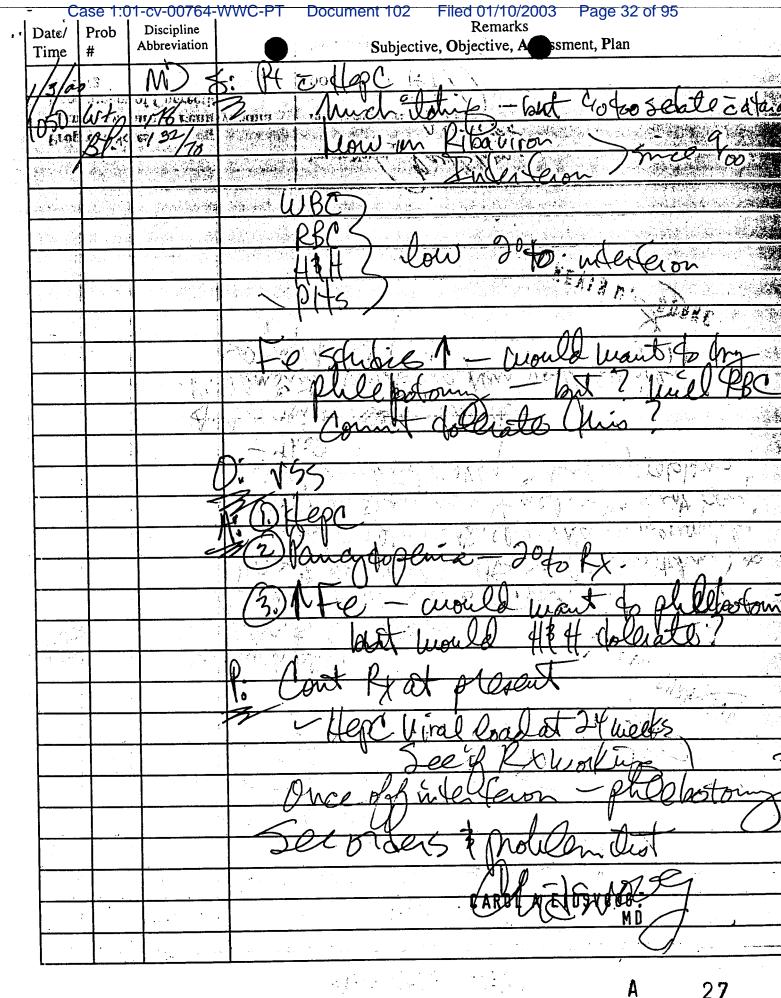
**Progress Notes** Commonwealth of Pennsylvania **Department of Corrections** DC-472

Inmate Name: Clark Williamster Number: Al 5585

DOB: 9-11-54

Institution: SURochwicz

Case 1:0	01-cv-00 <b>76</b> 4	I-WWC-PT Document 102 Filed 01/10/2003 Page 31 of 95
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Progress Notes
Commonwealth of Pennsylvania
Department of Corrections DC-472

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Progress Notes
Commonwealth of Pennsylvania
Department of Corrections
DC-472

**Inmate Name:** 

ACULATION MICH

Inmate Number:

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Progress Notes  A - CIPARK, WILLIAM FINE Progress Notes
Commonwealth of Pennsylvania Department of Corrections DC-472  Inmate Number: 45574  DOB: 9-11-54 A 34
Institution:

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**Progress Notes** Commonwealth of Pennsylvania **Department of Corrections** DC-472

Inmate Name: Claude wellearn
Inmate Number: A y 5585

DOB: 9-11-54

Institution:

- Case 1:01-cv-00764-WWC-PT Document 102 Filed 01/10/2003 Page 42 of 95	
Date/ Prob Discipline Abbreviation Subjective, Objective, Assessment, Plan	
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Comi	nonwea	olth of Penns of Correction	ylvania , Inmate Number: 145575
DC-4			DOB: 9-11-5-4-2 ME GROWN 48
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Date/ Time	Prob#	Discipline Abbreviation	Remarks Subjective, Objective, Assessment, Plan
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\\	,		PROGRESS NOTES
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Date/ Time	Prob #	Discipline Abbreviation	Remarks
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	- Progre	ss Note	<u> </u>	Inmate Name: lak, william
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Date/	Prob	Discipline	Remarks
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Progr	ess Not	es)	Inmate Name: Clair Will and
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DC-47	2	or correction	DOB: 58
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Progr	ess Not	es	Inmate Name: Claus William Charles
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Date/	Prob	Discipline	[ ] Inpatient
ime	#	Abbreviation	Remarks
3-15-1	h	NOAA	Subjective, Objective, Assessment, Plan
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	·		250° Blood taken UK pre 134/80 P100 P/S
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		MK 1	Una to should the botoms are a strike
Progress	s Notes		Inmate Name:
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Commonwealth of Pennsylvania
Department of Corrections
DC-472

Inmate Name:

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SKK, William

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	Case 1	:01-cv-0076	
Date/ Fime	Prob #	Discipline Abbreviation	Remarks Subjective, Objective, Assessment, Plan
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		•	PROGRESS NOTES
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Date/ Time	Prob #	Discipline Abbreviation	Remarks Subjective, Objective, Assessment, Plan
4-12-1	1	Pa	5: States he is mable to sleep 2° prints.
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			Question after a few weeks ble of
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Case 1:	01-cv-00764-	WWC-PT Document 102 Filed 01/10/2003 Page 73 of 95
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**Progress Notes** Commonwealth of Pennsylvania **Department of Corrections** DC-472

Inmate Name: Clark William
Inmate Number: Ay 5585

Facility: Dark.

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		and the second s	Mored = Genotype	
	Programme or containing of		amside PEG	
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	or framework	**************************************	Symple avoided.	
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	57		A) in line Chalid.	
013		C	Domen Cine	
		الحياد الأرابية الأرابية الأستواد عمريا. ا		
			and No.	
9.1			Dr. Symons	<u> </u>
	<u> </u>			

**Progress Notes** Commonwealth of Pennsylvania **Department of Corrections** DC-472

Inmate Name: ElWh, Wm
Inmate Number: AYSS 85

DOB:

82

Facility:

Date/ Time	Prob #	Discipline Abbreviation	Rema. Subjective, Objective, Assessment, Plan
8)14/	٥٦:	PAC	S' LAB Periew
0950			0: HCV Genstype 1
	÷	:	A: HCVB
			P'. Flu T. Dr. Symons as scheduled Ademon PAC
			Ademan PAC
			Angela Auman P
8-12	21	Pox	S: Continues to clo severe purities-
ODYK	10		Atarax helps simetimes but not
7	A		all the time. Psoriasis acting up.
			Requests results of Genotype Hev- Typ
			AFF continues to 1 new 69.9
			D'MAD
			A: HCV
			Psoniasio
			f: alreader scheduled & Syrons 8/28 - WI to to more up to next week
			In to more up to next week
			CHERYL XIMMEL PA'S
6/20/0	A	POC	S: Requesting cream for Provides 5
0730			on hands - Skin now beginning to
			crack rausing Apain
			0: NBO
			Skin- Descaling white plagues over
			dorsal fingers + mcp & fissuring
			a ne ne
·			p' See Olders BRIDGE, Illin PAG
			pf post

A

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·			
Date/ Time	Prob #	Discipline Abbreviation	Remar Subjective, Objective, Assessment, Plan
9/4/01	Ċ	PM	3: Pt requesting renual MVI and
6745			Aspirin.
		· · · · · · · · · · · · · · · · · · ·	0: Npp Bro13
			A: med Renewal
			P: See Olders
			P. See Olders BRIDGET FINH PAC
9/18/01	A	PAC	S: Pt continues to do intense
1215	C		generalized ikhing Only taking
			Amond @ night ble during day
			he can "deal to it." Requesting to
			see mo.
			O'. NAD
<u> </u>			A. Prusth's
			P: Will consult Dr. Symons +
			Schedule Pt for Lotters up
			Byma
			BRIDGET FINN PAC
10/1	4	_	
10/1/01	1	PM	5: Pt checking on Dermatology consult
0745			O/A: Psoriasis
			P: Consult submitted - quaiting appt
			maked
			BRIDGET FINN PAC
12/2	2	PR.	
1000	100	120	5:146
1000	$\overline{}$		0: PST-68 ATT-68 AILPHOS 160 ATT-83
			P. Ho as scheduled WERLANEL PA-C
			707712
			A 85

	•	PROGRESS NOTES
[]Ou	tpatient	[ ] Inpatient
Date/ Prob	Discipline Abbreviation	Remarks Subjective, Objective, Assessment, Plan
966 C		(5) Lobo renewed
1220		6 HCV RNA 467000
		(a) Her C vin
		1 12. Conult.
		Domes, M.D.
19/10/61 A	me	S: Pt inquiring about demalology consult. Shill having a lot of pain t
1020		
		itching 12
	7	1. P301/45/5
.:		p: Snake à Di Symon 3 - DAM consult
		denied but he will be calling to
		Speak & Di Dunne
		Budget Finn AR
		7,1.0-9
	+	
		1 1 112

**Progress Notes** Commonwealth of Pennsylvania **Department of Corrections** DC-472

Inmate Name: Www.WM
Inmate Number: A/15585

DOB: 9-1154

Facility: SCIROC

Α 86

		•	1 KOGKESS NOTES
	[]0	utpatient	[ ] Inpatient
Date/	Prob	Discipline	Remarks
Time	#	Abbreviation	Subjective, Objective, Assessment, Plan
1924	77	PAC	S: Wants to know when he well be schoduled
aw	16		or symund. do rgas, abd cramping, intermultan
		·	diarrhea. Has not A earling habits. No med A.
			Denies 1 stress. Odeppepua, Jemelina,
			Thematochezia. also 40 mire otrem?
			is "plow" x past mo. Denies urgency,
		-	Resitaria. Break in stream, himatrina,
		-	or dipuria.
			D: NAD T:978
			Abd: FBSKY soft nontender gorganomegalez
			It. doesn't want rectal due toda
			A hyperflutalence
			P: VPSA and U/A
			Try Somethicure for 9 flatulance
			O
	,	1 5	CHERYI CHARET CA-C
10/2	9/01	WD	S- do And Suphing from.
1 1	N.		Cold well.
	DV.		p- A-d - plusur x-
			a colle.
			A) (Koviano) & Add Penen
			Plindymy Doss Res Tothan
			JOHN SIMMO
	<u></u>		Do a he 31 20 VSMAD AND
			Inmate Name: Lanh. I'm

**Progress Notes** Commonwealth of Pennsylvania **Department of Corrections** DC-472

Inmate Name: lank, Non-1919 De Inmate Number: A 15-58-5

DOB: 9/11/54

Facility: Salveta

88

	Cas	<u>. 1.01</u>	-cv-0076/-\A	/WC-PT Document 102 Filed 01/10/2003 Page 91 of 95
, •	Date/ Time	Prob	Discipline Abbreviation	Remarks Subjective, Objective, Dessment, Plan
	aliibi	C	Ph	DICMVI- pl notified VIa memmo
	0935			Chammeltic
				CHAMMERK
	rikin	0	PR	Madrenewal CHERYL KIMMEL PA-C
	Odfs			Med renews  CHERYL KIMMEL PA-S  Symm MO
				CHERYL KIMMEL PA-8
	1/9/4		MD	Med renewal
. 4	(4)			Symn mo
				G '
. "				•
***				
		·		
21				

	[](	Outpatient	[ ] Inpatient
)ate/ 'ime	Prob #	Discipline Abbreviation	Remarks
1.		-	Subjective, Objective, Assessment, Plan
1/16/	<i>σ</i> 1	W()	5- 00 km do
710	1		did strucci
1	id		O_NAD
	/ 0		Ridd- And south remarked
			ne Prentati
			god to.
			A) Rich DSP
	,		P) Fly Coul,
-			JOHN
			SYMONS MD
			of mn
42	8/01	m	S- do worse projeció
	<u>a</u>		D- NAM
	<i>t</i> 1)		stein Wolffan Marin
			A) Work a sonin
			b) - 8 40 Drans
			TOO or dery Zo
			9000000
			- MMX

**Progress Notes** Commonwealth of Pennsylvania **Department of Corrections C-472** 

Inmate Name: Clark, William

Inmate Number: AY 5585

DOB: 9-11-54

Facility: Rock view

A 90

Dated Prob Discipline Time # Abbreviation Subjective, Objective, Tassessment, Plan  Vilb2 C ONC 5: Cab  0: P5/172 MTA 74, All Phool 158  0: CG 7790  M: Mayor  Discipline  1: P5/172 MTA 74, All Phool 158  CG 7790  M: Mayor  Discipline  Subjective, Objective, Tassessment, Plan  REPUTS  BRIDGET FINH PAB  RIEMER  PAD Comman  M. D.  MAYOR S-O Amend Aparthing for my phonocasis  M. D.  All Discipline  And Date St. Paparitis for my phonocasis  And Date St. Paparitis	Case	1:01-cv		#8-PT Document 102	Filed 01/10/2003 Pag	ge 93 of 95	
Miles C DR S. Cab  0. PSTT72, MTA 74, Alk Proof 15 8  0. PST as scheduled  0. PST 148  0. PST as scheduled  0. PST 148  0. PST 148  0. PST A. Proving and another for my proving 18  10:20  10:	1.		Discipline Abbreviation	Su	Remarbjective, Objective, Assessme	ent, Plan	
CGTTIGO  M. May Schooluled  D. Mu as schooluled  BRIBGET FINH PAB	<del>-, , -</del>	#		5: Cab	MARATH All	Phost	158
BRIBGET FINH PAGE  BRIBGET FINH	<b>\</b>						·
BRIOCET FHAN PAGE  C-10/2 C- FILD Paourin and and an I remainder  BRIOCET FHAN PAGE  PAUL  RIGHTER  M.D.			n. Myc			· · · · · · · · · · · · · · · · · · ·	
1600 180 WHIGH S-O FID Province and any of a Transmite RAFMER P-Mr Dayre ROEMER M.D.  HOLD A W-MA S-O I was south for my provinces  10-20 M.D. O- See Has Colinia DC SHR  A-D-LOC D. See Has ORNA		<del> </del>	<u> </u>	p. 1/4 as		13/	'M
How A Province and April RIGHER  P-Mb dayer Norm M.D.  How A W-MA S-O I was southing for my provinces.  16:20 DD-121-12 O- See Ara C clinic DC 448  16:20 DD-121-12 O- See Ara C clinic DC 448  N-10 ND-15- Da +5m DR.  A-Dha C D  Province  P Documents  P D DC Totamerine and  P D DC Totamerine and  P D DC Totamerine and  N.D.  P HILL  Our RDEMER  M.D.		<del>                                     </del>		· in	BR	TDEET FINN	P AG
1000 A W-PA S-O done aprillip for my provinces  10:20 D-101 D O- See Ara C climic D C 518  10:20 D-101 D O- See Ara C climic D C 518  10:20 D-101 D O- See Ara C climic D C 518  10:20 D-101 D D D D D D D D D D D D D D D D D D	1140	1 nazo	W+192#	5-00	<u> </u>	Trum	- mtru
How A M. M. S. O I was a another for my provious.  16:20 D. W. D. Sac Hap C clinic DC 508  16:20 D. J. D. Sac Hap C clinic DC 508  N-10 MS JS. C. Sa t Sn ORM  A-Dhac D  Place on Agu Hap C protoco.  Place on Agu Hap C protoco.  P. III.  BORNE MER.  N. D.			10-108	D- FU Paou	arir cuchanger		
HOOD A W-998 S-O I need southing for my provioses  16:20 DIJA D- See Hep C clinic DC \$#8  16:20 DIJA - Aurole alext Lup-clean, Heat  N-10 MSHS, DSa +Sy CRM  A-DHAC D  Departure  P-D DIC Torameinology  P-D DIC Torameinology  P-D DIC Torameinology  P-D DIC Torameinology  M.D.  M.D.			BP-122/80	P- 9ho Dang	re Joenn	ROFMER	
10-20  10	N.		1 1	2 5-0 2	I sa this far	my Rose	2825
A-110 MSH5, DSa+SM ORNA  A-110 MSH5, DSa+SM ORNA  A-110 MSH5, DSa+SM ORNA  A-110 MSH5, DSa+SM ORNA  A-110 MSH5, DSa-LSM  A-110 MSH5, DS		<del>2001-1</del>	DD-122	H2 0- See 1	Hop C clinic D	<u> </u>	Heat
A=D Nep C D  Place m Agen Hep C Drotocrol,  P III  Pane M.D.,			12-10-	1 Physical C	DA FON UNIT	()	
Place on Agu Hep C Paolocol,  PILL  PANE M.D.				Apa-soft	Trucag @ K3	· Xuam	
Dene man Hep C Protoco.  P III  Dene RDEMER  M.D.				1 DHO LOUNT	mu		·
Danc RDEMER M.B.				18-0 DIC	Toransinolone HCDC	Protoc	20 ,
Δ 91				My frage	(	Maren	ROEMER
Δ 91	-	-					<u>— М. и,                                    </u>
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Δ 91							
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### IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM CLARK,

Plaintiff,

Civil No. 01-0764

V.

(Judge William W. Caldwell)

LARRY LIDGETT, et al.,

JURY TRIAL DEMANDED

Defendants.

#### **PROOF OF SERVICE**

The undersigned hereby certifies that the Corrections Defendants' Praecipe to Substitute was served upon the person(s) in the manner indicated below.

### Service by first-class mail addressed as follows:

William Clark, AY-5585

**SCI-Rockview** 

Box A

Bellefonte, PA 16823

James D. Young, Esquire

Lavery, Faherty, Young & Patterson, PC

The Kunkel Building

301 Market Street, Suite 800

P.O. Box 1245

Harrisburg, PA 17108-1245

PA Department of Corrections 55 Utley Drive Camp Hill, PA 17011 (717) 731-0444

Dated: January 10, 2003

Assistant Counsel

#### IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM CLARK,

Plaintiff,

Civil No. 01-0764

v.

(Judge William W. Caldwell)

LARRY LIDGETT, et al.,

JURY TRIAL DEMANDED

Defendants.

#### **PROOF OF SERVICE**

The undersigned hereby certifies that a copy of each of the Corrections Defendants' Praecipe to Substitute was served upon the person(s) in the manner indicated below.

### Service by first-class mail addressed as follows:

William Clark, AY-5585

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Bellefonte, PA 16823

James D. Young, Esquire

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The Kunkel Building

301 Market Street, Suite 800

P.O. Box 1245

Harrisburg, PA 17108-1245

Marilyn Jones

Clerk Typist 2

PA Department of Corrections 55 Utley Drive Camp Hill, PA 17011 (717) 731-0444

Dated: January 10, 2003